

**SANTA MONICA MOUNTAINS CONSERVANCY**

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February 26, 2007

Kelly Sherman and Laura Parsons  
Office of Pesticide Programs (OPP)  
Regulatory Public Docket (7502P)  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW.  
Washington, DC 20460-0001

**Comments on Proposed Risk Mitigation Decision for Nine Rodenticides**  
**Docket ID No. EPA-HQ-OPP-2006-0955**

Dear Ms. Sherman and Ms. Parsons:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Environmental Protection Agency's (EPA) January 17, 2007 Proposed Risk Mitigation Decision for Nine Rodenticides. The Conservancy is in full support of the proposed risk mitigation measures.

The significant risks associated with the nine subject rodenticides (brodifacoum, bromadiolone, difethialone, warfarin, chlorophacinone, diphacinone, bromethalin, cholecalciferol, and zinc phosphide), to non-target wildlife are of extreme concern. With the ongoing increase of development throughout the Santa Monica Mountains and Rim of the Valley Trail Corridor zones, the current availability of these rodenticides as household products constantly threatens native wildlife. The Santa Monica Mountains National Recreation Area staff has documented secondary exposure in five of six tested mountain lions, and 90 percent of tested bobcats. Incident reports in California and New York that indicate death as a result of exposure to these rodenticides in more than half of the species studied clearly portends the importance of restricting the use of anti-coagulants.

The rate of rodenticide exposure to children is unacceptably high. The Conservancy supports the criteria for tamper-resistant bait stations and agrees with the EPA that the expected reduction in children's exposure to rodenticide bait products outweighs the estimated increase in cost as a result of new requirements for tamper-resistant bait stations.

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Due to a growing population and urban development encroaching natural habitats, the availability of the subject rodenticides as common household products alone warrants approval of the proposed risk mitigation decisions. The Conservancy fully supports the proposed decision to classify anti-coagulants as restricted-use pesticides and new requirements for tamper-resistant bait stations, and urges the EPA to adopt these measures without delay.

Sincerely,

ELIZABETH A. CHEADLE

Chairperson